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April 3, 2017

Scott Janoe TEL 713-229-1553 scott janoe@bakerbotts com

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Kenneth Talton, Enforcement Officer Superfund Enforcement Assessment Section (6SF-TE) U.S EPA, Region 6 1445 Ross Avenue Dallas, Texas 75202-2733

Hess Corporation Response to Information Request Regarding the SBA Shipyard Re: Superfund Site

Dear Mr Talton:

Enclosed please find Hess Corporation's response to the CERCLA Section 104(e) Information Request regarding the SBA Shipyard Superfund Site located in Jennings, Jefferson Davis Parish, Louisiana dated January 11, 2017.

If you have any questions about the enclosed response or documents, please contact me at scott.janoe@bakerbotts.com or 713-229-1553.

Sincerely,

Scott Janoe

SJ Enclosures

Active 35043816 I

Hess Corporation Response to SBA Shipyard Superfund Site Jennings, Jefferson Davis Parish, Louisiana Information Request

Definitions

Hess Corporation ("Hess") objects to the definitions of "document(s)", "documentation" and "identify" as overly broad and unduly burdensome, to the extent that they require Hess to provide documents: (1) that cannot be located after a good faith and diligent search of Hess's records, or (2) not within Hess's possession, custody or control.

In addition, Hess objects to the definition of "Respondent" as overly broad and unduly burdensome. Hess is responding on behalf of the legal entities identified in the response to Question 1, and is not responding on behalf of any other individual entity.

Questions

General Information Concerning Respondent

1. Provide the full legal name and mailing address of the Respondent

Response

Hess Corporation is responding on behalf of itself and Amerada Hess Shipping Corporation, now known as Hess Shipping LLC (collectively the "Hess Entities"). The mailing address of Hess Corporation is:

1501 McKinney Houston, Texas 77010

The mailing address of Hess Shipping LLC is:

1185 Avenue of the Americas New York, New York 10036

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer

1

Response:

The responses were prepared by counsel after consultation with

Alan Colletti Marton, Ottaway, Van Hemmen & Dolan, Inc. 172 Monmouth St., Suite 201 Red Bank, NJ 07701 (732) 224-1133 acolletti@martinottaway.com

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number

Response:

Alan Lindsey
Senior Legal Counsel
Hess Corporation
Exploration & Production
1501 McKinney
Houston, Texas 77010
(713) 496-4438
alindsey@hess.com

4. If Respondent is a business, please give a brief description of the nature of the business

Response:

Hess is a global independent energy company engaged in the exploration, development, production, transportation, purchase and sale of crude oil, natural gas liquids, and natural gas Hess Corporation was formerly named Amerada Hess Corporation.

Under its former name Amerada Hess Shipping Corporation, Hess Shipping LLC was the owner of oceangoing barges, including the Hovic III and the Leeward Islander

Requests for Documents

Section 1

1. Have you or any associated and/or related entities in any way been involved with or conducted business with the Site?

Response: Yes

a If so, please describe your involvement with the Site

Response

As described in more detail in Attachment A, a Hess-related entity commissioned the building of certain barges at the shipyard in the 1970s Hess would like to

correct the statement in Attachment A by noting that Hess records show that Amerada Hess Corporation previously owned five barges built at the shipyard in the 1970s ST-90, ST-85, ST-65, HYGRADE 24 and HYGRADE 22. In addition, documents provided by EPA on January 17, 2017 suggest that two other vessels owned by Amerada Hess Shipping Corporation were serviced at the Site by Marine Chemists, Inc. of Texas on two separate occasions in April 1989 (Hovic III) and November 1990 (Leeward Islander).

b Provide copies of documents related to any involvement with the Site

Response:

Enclosed please find the document Bates labelled HESSSBA000001 to HESSSBA000006. These are excerpts from a larger offering memorandum prepared in connection with the sale of various shipping assets described in Attachment A, including the five barges manufactured at the Site.

Section 2

3. Please identify any dealings or transactions you and/or any associated entities have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc. n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred

Response.

Hess objects to this request to the extent that it calls for information concerning dealings with these companies and individuals that have no connection to activities at the Site

a Specifically, provide date(s) that your barge(s) were sent to and/or removed from the Site, the type of product and/or material your barges brought to the Site, the name and contact information of the person who made such arrangements.

Response:

Based on information and belief, the Hovic III was present at the Site and inspected there by Marine Chemists, Inc of Texas on April 3, 1989 and the Leeward Islander was present at the Site and inspected there by Marine Chemists, Inc. of Texas on November 16, 1990. In addition, Hess records show that five barges previously owned by Amerada Hess Corporation were built at the shipyard in each of the following years:

ST-90	1972

ST-85	1976
ST-65	1978
HYGRADE 24	1974
HYGRADE 22	1973

Hess's March 19, 2015 letter (Attachment A) stated that the barges built at the shipyard in the 1970s were sold to Hornbeck Offshore Services in 2001. Hess would like to clarify that the barges were sold in 2001 to the predecessor entity to a subsidiary of Hornbeck Offshore Services by the name of LEEVAC Marine, Inc. At the same time as this transaction, Amerada Hess Corporation also entered into a contract of affreightment with LEEVAC Marine, Inc. Until 1997 when LEEVAC Marine, Inc. was sold to Hornbeck Offshore Services, Cari Investment Company was the parent company of LEEVAC Marine, Inc. From 1965-2016, Cari Investment Company also owned LEEVAC Shipyards Jennings, LLC. Hess does not have information regarding the relationship between LEEVAC Marine, Inc. and LEEVAC Shipyards Jennings, LLC. The 2001 transactions with LEEVAC Marine, Inc. did not involve LEEVAC Shipyards Jennings, LLC or any of the other entities named in Question 3. These transactions also did not relate in any way to the Site.

In addition, Hess records show transactions and/or correspondence with LEEVAC Marine, Inc. in the 1990s and early 2000s. In the years 1991, 1994 and 1997, a Hess-related entity paid invoices for tug and barge transport services provided by LEEVAC Marine, Inc. In April and October 1997, a Hess-related entity provided towing services to LEEVAC Marine, Inc. In 2000 and 2002, Amerada Hess Corporation and LEEVAC Marine, Inc. exchanged correspondence regarding alleged collisions between barges in New Jersey. As stated above, until 1997 when LEEVAC Marine, Inc. was sold to Hornbeck Offshore Services, Cari Investment Company was the parent company of LEEVAC Marine, Inc. From 1965-2016, Cari Investment Company also owned LEEVAC Shipyards Jennings, LLC Hess does not have information regarding the relationship between LEEVAC Marine, Inc and LEEVAC Shipyards Jennings, LLC. The transactions and/or correspondence described above do not involve LEEVAC Shipyards Jennings, LLC or any of the other entities named in Question 3. These transactions and/or correspondence also do not relate in any way to the Site

4 Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 3 above

Response:

Hess objects to this request to the extent that it calls for information concerning dealings with these companies and individuals that have no connection to activities at the Site.

Enclosed please find the document Bates labelled HESSSBA000001 to HESSSBA00006. These are excerpts from a larger offering memorandum prepared in connection with the sale of various shipping assets described in Attachment A, including the five barges manufactured at the Site. Hess is providing the enclosed document regarding the dealings and transactions described in response to Question 3 that relate to the Site. Hess is not providing documents regarding the dealings and transactions described in response to Question 3 that do not relate in any way to the Site.

Please include a detailed listing of cargo materials from transactions described in Question 3 the materials data safety sheet, dates of transaction, and any quantity associated with those materials

Response:

Hess objects to this request to the extent that it calls for information concerning dealings with these companies and individuals that have no connection to activities at the Site. The Hess Entities do not have information concerning any cargoes that may have been brought to the Site.

- Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes) This information shall include, but not be limited to, the following
 - a Each individual's job title and duties (including the dates performing those duties),

Response:

Hess objects to this request as overly broad and unduly burdensome. Information concerning the current and past structure of environmental staffing at the Hess Entities is irrelevant to operations at the Site. Subject to and without waiving this objection, and after reasonable inquiry, the Hess Entities do not have information concerning individuals who may have been responsible for environmental compliance issues at the Site in 1989 and 1990.

b The supervisors for such duties,

Response.

Hess objects to this request as overly broad and unduly burdensome. Information concerning the current and past structure of environmental staffing at the Hess Entities is irrelevant to operations at the Site. Subject to and without waiving this objection, and after reasonable inquiry, the Hess Entities do not have information concerning individuals who may have been responsible for environmental compliance issues at the Site in 1989 and 1990.

c The current position or the date of the individual's resignation,

Response:

Hess objects to this request as overly broad and unduly burdensome. Information concerning the current and past structure of environmental staffing at the Hess Entities is irrelevant to operations at the Site. Subject to and without waiving this objection, and after reasonable inquiry, the Hess Entities do not have information concerning individuals who may have been responsible for environmental compliance issues at the Site in 1989 and 1990.

d The nature of the information possessed by such individuals concerning the Respondent's waste management, and

Response:

Hess objects to this request as overly broad and unduly burdensome. Information concerning the current and past structure of environmental staffing at the Hess Entities is irrelevant to operations at the Site Subject to and without waiving this objection, and after reasonable inquiry, the Hess Entities do not have information concerning individuals who may have been responsible for environmental compliance issues at the Site in 1989 and 1990.

e The contact information of the individual

Response:

Hess objects to this request as overly broad and unduly burdensome. Information concerning the current and past structure of environmental staffing at the Hess Entities is irrelevant to operations at the Site. Subject to and without waiving this objection, and after reasonable inquiry, the Hess Entities do not have information concerning individuals who may have been responsible for environmental compliance issues at the Site in 1989 and 1990

7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s)

Response:

Hess objects to this request as overly broad and unduly burdensome. Information concerning the Hess Entities' RCRA permits is irrelevant to operations at the Site. Subject to and without waiving this objection, while the Hess Entities have various RCRA permits, the Hess Entities do not have and have never had a RCRA permit relating to this Site.

8. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations

Response:

Hess objects to this request as overly broad and unduly burdensome Information concerning the Hess Entities' RCRA Identification Numbers is irrelevant to operations at the Site. Subject to and without waiving this objection, while the Hess Entities have various RCRA Identification Numbers, the Hess Entities do not have and have never had a RCRA Identification Number relating to this Site.

9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s)

Response.

Hess objects to this request as overly broad and unduly burdensome. Information concerning the Hess Entities' state waste permits is irrelevant to operations at the Site Subject to and without waiving this objection, while the Hess Entities have various state waste permits, the Hess Entities do not have and have never had a state waste permit relating to this Site.

Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s)

Response:

Hess objects to this request as overly broad and unduly burdensome. Information concerning the Hess Entities' EPA Identification Numbers is irrelevant to operations at the Site Subject to and without waiving this objection, while the Hess Entities have various EPA Identification Numbers, the Hess Entities do not have and have never had an EPA Identification Number relating to this Site.

Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed

Response.

Hess objects to this request as overly broad and unduly burdensome. Information concerning waste information submitted to federal, state or local agencies by the Hess Entities is irrelevant to operations at the Site Subject to and without waiving this

objection, and after reasonable inquiry, the Hess Entities have not submitted waste information concerning the Site to any federal, state, or local agencies.

12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site

Response:

Hess objects to this request to the extent that it request documents that have no connection to activities at the Site or documents that are not in Hess's possession, custody or control. Subject to and without waiving this objection, and after reasonable inquiry, the Hess Entities do not have information regarding any materials that may have been taken to the Site.

- 13. If barges were placed or disposed at the Site, provide the following information
 - a Where they were placed or disposed, and

Response:

Other than the information concerning a buried barge provided in the letter from EPA addressed to Hess regarding the Site and what is publicly available on the internet, after reasonable inquiry, the Hess Entities are not aware of any barges being placed or disposed of at the Site.

b Their condition when placed or disposed of

Response.

Other than the information concerning a buried barge provided in the letter from EPA addressed to Hess regarding the Site and what is publicly available on the internet, after reasonable inquiry, the Hess Entities are not aware of any barges being placed or disposed of at the Site

Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site—Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made Provide all of the information known by the Respondent regarding the customers or individuals

Response:

Other than publicly available information on the internet, after reasonable inquiry, the Hess Entities are not aware of any other individuals and entities that may have taken or sent materials to the Site

BARGES

VESSEL	YEAR BUILT	O.N.	GRT	SIZE L x B x D	CAPACITY (000) BBLS.	LOAD LINE	LL * DRAFT	PUMP RATE	PRIMARY MANIFOLD BOW TO STERN	SECONDARY MANIFOLD BOW TO STERN
ST-114	1979	608351	6925	420' 00" x 70' 00" x 32' 10"	110	YES	23' 03"	14,000 BPH	224'/195'	360'/60'
ST-112	1979	606890	6925	420' 00" x 70' 00" x 32' 10"	110	YES	23' 03"	14,000 BPH	224'/195'	
HYGRADE 95	1967	511528	6293	390' 00" x 68' 00" x 29' 03"	95	YES	21' 03"	12,000 BPH	220'/70'	335'/55'
ST-90	1972	545087	5869	346' 04" x 70' 00" x 28' 00"	90	YES	21' 06"	10,000 BPH	303'/50'	175'/175' - STB ONLY
ST-85	1976	576625	5323	360' 00" x 64' 00" x 27' 00"	85	YES	21' 07"	10,000 BPH	303'/56'	180'/180'
ST-65	1978	589642	4064	328' 00" x 66' 00" x 22' 06"	65	YES	17' 00"	10,000 BPH	268'/60'	164'/164' - NO VAPOR RECOVERY
ETHEL H	1958	277709	3872	305' 00" x 65' 00" x 22' 00"	65	YES	16' 11"	7.000 BPH	204'/101'	
HYGRADE 24	1974	557364	1347	242' 04" x 43' 04" x 15' 10"	22	YES	12' 01°	6,000 BPH	202'/40'	
HYGRADE 22	1973	545745	1347	242' 04" x 43' 04" x 15' 10"	22	YES	12' 01"	6,000 BPH	203'/39'	
HYGRADE 42	1968	515005	2596	299' 07" x 43' 04" x 22' 06"	42	YES	18' 06"	10,000 BPH	262'/37'	150'/149'- PT ONLY

*MANNED LL DRAFT

VESSEL	ABS CERT.	VAPOR RECOVERY	HIGH & OVERFLOW ALARMS	CENTRALIZED REMOTE GAUGING	HEATING COILS	BOILER	DOUBLE BOTTOM	OPA PHASE OUT
ST-114	X	Х	Х	X	X	X	X	07/01/09
ST-112	X	Х	X	X	X	Х	Х	06/01/09
HYGRADE 95	X		X	X	X		X	12/31/04
ST-90	X	X	X	Х	Х			12/31/04
ST-85	X	х	X	X	X			12/31/04
ST-65	Х	X	X	X	Х			2015
ETHEL H	X	X	X	X	X			2015
HYGRADE 24	X	X	X	X	Х			2015
HYGRADE 22	Х	X	X	X	X			2015
HYGRADE 42	Х	Х	Х	х	Х			2015

GENERAL		ELECTRICAL PLANT	
Name	ST-90	No. Generators	2
Yr. Build	1972	Manufacturer/Model	Delco
Builder	SBA Jennings LA	K.W.	50 KW
Official No.	545087	Driver	Diesel
Flag	US	Manufacturer/Model	Detroit 3-71
Classification	ABS		
Capacity (BBLS)	90,000	ANCHOR WINDLASS	
		Manufacturer/Model	SBA
VESSEL PARTICUL	<u>ARS</u>	Driver	30 HP Hydraulic
Length	346' 04"		
Beam	70' 00"	CARGO SYSTEM	
Depth	28' 00"	Coils	Yes
Loadline Draft	21' 06"	Boiler	No
Gross Tons	5869	Vapor Recovery	Yes
Hull Type	Single Hull	High Level Alarm System	Yes
		Over Flow Alarm System	Yes
PUMPING SYSTEM		Automated Gauging System	Yes
No. Pumps	3		
Manufacturer/Model	Deepwell	SHIPYARD & MAINTENANCE!	<u>HISTORY</u>
Capacity	(2) @ 5,000 bph, (1) @ 3,500 bph	Last Drydock	9/99
Driver	Diesel	Next Drydock	8/02
Manufacturer/Model	Detroit - (2) 12V71, (1) 8v71	Last Special Survey	9/99
		Next Special Survey	9/04
		Five (5) Year Load Line	9/04

<u>GENERAL</u>		ELECTRICAL PLANT	
Name	ST-85	No. Generators	2
Yr. Build	1976	Manufacturer/Model	Delco
Builder	SBA Jennings LA	K.W.	50 KW
Official No.	576625	Driver	Diesel
Flag	US	Manufacturer/Model	Detroit 3-71
Classification	ABS		
Capacity (BBLS)	85,000	ANCHOR WINDLASS	
-		Manufacturer/Model	Prager
VESSEL PARTICULAI	RS	Driver	20HP Hydraulic
Length	360' 00"		
Beam	64' 00"	CARGO SYSTEM	
Depth	27' 00"	Coils	Yes
Loadline Draft	21' 07"	Boiler	No
Gross Tons	5323	Vapor Recovery	Yes
Hull Type	Single Hull	High Level Alarm System	Yes
		Over Flow Alarm System	Yes
PUMPING SYSTEM		Automated Gauging System	Yes
No. Pumps	2		
Manufacturer/Model	Byron Jackson	SHIPYARD & MAINTENANCE I	HISTORY
Capacity	5,000 BPH ea.	Last Drydock	9/99
Driver	Diesel	Next Drydock	8/01
Manufacturer/Model	Detroit - 12V71	Last Special Survey	9/99
		Next Special Survey	9/04
		Five (5) Year Load Line	9/04

GENERAL		ELECTRICAL PLANT	
Name	ST-65	No. Generators	2
Yr. Build	1978	Manufacturer/Model	Delco
Builder	SBA Jennings La.	K.W.	50 KW
Official No.	589642	Driver	Diesel
Flag	US	Manufacturer/Model	Detroit 3-71
Classification	ABS		
Capacity (BBLS)	65,000	ANCHOR WINDLASS	
		Manufacturer/Model	Prager
VESSEL PARTICULA	<u>RS</u>	Driver	30 HP Hydraulic
Length	328' 00"		
Beam	66' 00"	CARGO SYSTEM	
Depth	22' 06"	Coils	Yes
Loadline Draft	17' 00"	Boiler	No
Gross Tons	4064	Vapor Recovery	Yes
Hull Type	Single Hull	High Level Alarm System	Yes
		Over Flow Alarm System	Yes
PUMPING SYSTEM		Automated Gauging System	Yes
No. Pumps	2		
Manufacturer/Model	Johnson	SHIPYARD & MAINTENANCE I	HISTORY
Capacity	5,000 BPH ea.	Last Drydock	8/98
Driver	Diesel	Next Drydock	7/01
Manufacturer/Model	Detroit - 12V71	Last Special Survey	7/97
		Next Special Survey	7/02
		Five (5) Year Load Line	7/02

<u>GENERAL</u>		ELECTRICAL PLANT	
Name	HY-24	No. Generators	2
Yr. Build	1974	Manufacturer/Model	Delco
Builder	SBA Jennings LA	K.W.	50 KW
Official No.	557364	Driver	Diesel
Flag	US	Manufacturer/Model	Detroit 3-71
Classification	ABS		
Capacity (BBLS)	22,000	ANCHOR WINDLASS	
		Manufacturer/Model	New England Trawler
VESSEL PARTICULA	RS	Driver	10HP Hydraulic
Length	242' 04"		
Beam	43' 04"	CARGO SYSTEM	
Depth	15' 10"	Coils	Yes
Loadline Draft	12' 01"	Boiler	No
Gross Tons	1347	Vapor Recovery	Yes
Hull Type	Single Hull	High Level Alarm System	Yes
		Over Flow Alarm System	Yes
PUMPING SYSTEM		Automated Gauging System	Yes
No. Pumps	2		
Manufacturer/Model	Byron Jackson	SHIPYARD & MAINTENANCE	HISTORY
Capacity	3,000 BPH ea.	Last Drydock	5/99
Driver	Diesel	Next Drydock	9/01
Manufacturer/Model	Detroit - 12V71	Last Special Survey	3/98
		Next Special Survey	3/03
		Five (5) Year Load Line	3/03

<u>GENERAL</u>		ELECTRICAL PLANT	
Name	HY-22	No. Generators	2
Yr. Build	1973	Manufacturer/Model	Delco
Builder	SBA Jennings LA	K.W.	50 KW
Official No.	545745	Driver	Diesel
Flag	US	Manufacturer/Model	Detroit 3-71
Classification	ABS		
Capacity (BBLS)	22,000	ANCHOR WINDLASS	
		Manufacturer/Model	New England Trawler
VESSEL PARTICULA	<u>RS</u>	Driver	10HP Hydraulic
Length	242' 04"		
Beam	43' 04"	CARGO SYSTEM	
Depth	15' 10"	Coils	Yes
Loadline Draft	12' 01"	Boiler	No
Gross Tons	1347	Vapor Recovery	Yes
Hull Type	Single Hull	High Level Alarm System	Yes
		Over Flow Alarm System	Yes
PUMPING SYSTEM		Automated Gauging System	Yes
No. Pumps	2		
Manufacturer/Model	Byron Jackson	SHIPYARD & MAINTENANCE	HISTORY
Capacity	3,000 BPH ea.	Last Drydock	6/98
Driver	Diesel	Next Drydock	5/01
Manufacturer/Model	Detroit - 12V71	Last Special Survey	7/97
		Next Special Survey	7/02
		Five (5) Year Load Line	7/02







William S Pufko Assistant General Counsel Environmental Affairs (212) 536-8572 wpufko@hess.com

March 19, 2015

VIA CERTIFIED MAIL

Mark Hayes
Federal On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: SBA Shipyard (FPN E15608), Jennings, Louisiana

Dear M1. Hayes:

This follows up on our conversation regarding the letter Hess Corporation received from you in late February concerning a petroleum release incident associated with a buried barge at the former SBA Shippard in Jennings, Louisiana. Your letter stated that Hess may be responsible for remediation of the release.

After we received your letter, we took steps to investigate whether the barge was ever owned or operated by Hess Corporation. Your letter did not provide any information about the history or origin of the barge, so we endeavored to learn what we could about any Hess barges having a connection to SBA Shipyard.

Our investigation revealed that former or current-but-inactive subsidiaries of Hess commissioned the building of 4 barges at the Shipyard during the 1970's. These barges were then put into use at other locations and, to our knowledge, never returned, and had no reason to return, to the Shipyard. In 2001, all four barges were sold to Hornbeck Offshore Services.

Thus, it appears that Hess Corporation has no connection to the buried barge referenced in your letter. If you have any information to the contrary, such as SBA records or markings on the barge, certainly let us know, but barring the discovery of additional relevant facts, we must conclude that Hess is not a liable or responsible party under the CWA or the OPA. We ask that your office remove Hess from EPA's list of potentially responsible parties.

Thank your for your cooperation. Please let me know if you have any questions concerning our response to your letter.

Very truly yours,

William S. Pufko